

EXHIBIT B



Dilip Jana <janadilip@gmail.com>

Joint Conference Report [Jana v Walmart]: file format: .eml

1 message

Dilip Jana <janadilip@gmail.com>

Fri, Apr 11, 2025 at 10:49 AM

To: Morgan.Jones@gtlaw.com

Cc: Holmes.Hampton@gtlaw.com, peter.wahby@gtlaw.com

Bcc: Dilip Jana <janadilip@gmail.com>

Good morning Morgan:

I am responding to you question

“Do you have an alternative proposal for the default format for document production if you do not agree to PDF format? “

Yes, I want to suggest a very simple way to do it.

Let's talk about EXHIBIT 1 of DKT 13, the Complaint. Wendy Bowman wrote that email to few people. That email had few attachments. All you have to do is ask Walmart/Wendy Bowman in her Microsoft Outlook, please open the EMail, then File-> save as-> .eml

It should not take more than 1 minute to save that file in .eml format and we are litigating for 14 months

You can do same thing File-> save as-> .pdf but pdf will not attach attachments.

So .eml extension would do the job.

Please keep in mind the file needs to be saved in .eml format from user's account(for example Wendy Bowman's account) before sending to you guys.

Please let me know if you have any questions.

Kind regards,

Dr. Dilip Jana

800 Fairlawn St

Allen, TX, 75002

On Fri, Apr 11, 2025 at 9:52 AM <Morgan.Jones@gtlaw.com> wrote:

Thank you, Dilip. We will add your synopsis to the Report as soon as it is received. We made a few additions/changes to the Report as well. See attached containing both your and Walmart's redlines.

Do you have an alternative proposal for the default format for document production if you do not agree to PDF format?

The summary of the Rule 26 Conference is not necessary or required, so we removed it.

Morgan Jones
Associate

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From: Dilip Jana <janadilip@gmail.com>
Sent: Thursday, April 10, 2025 9:20 AM
To: Jones, Morgan (Assoc-DAL-LT) <Morgan.Jones@gtlaw.com>
Cc: Wahby, Peter (Shld-Dal-LT) <Peter.Wahby@gtlaw.com>; Hampton, Holmes (Assoc-DAL-LT) <Holmes.Hampton@gtlaw.com>
Subject: Re: Joint Conference Report [Jana v Walmart]

EXTERNAL TO GT

Dear Counsels:

Thank you for taking a lead on this, I truly appreciate it. I am extremely busy with my mortgage foreclosure situation as I have to make a few decisions within a very short period of time.

I have attached two files, one with the Original, the other with _v1 which I modified, it has tracking information as well. I still have to work on Plaintiff's synopsis which I'll work on later tonight.

Key points to note:

- I crossed out "~~The Parties agree that PDF format will be the default format for production of all documents unless native format is requested, at which time the Parties will either agree to production in that format or address the issue with the Court.~~"

as we did not discuss this issue during the Conference.

- *I feel it is necessary to provide a Meeting Summary to avoid misconstrued or taken out of context material, I added a summary, please feel free to add/modify as you feel appropriate*
- *Since I am not an attorney, I can't sign by /s/!! I have to sign it. Once I send you Plaintiff's synopsis later today, if you can send me the updated version sometime tomorrow noon, I can then file.*

Please let me know if you have any questions.

Kind regards,

Dr. Dilip Jana

800 Fairlawn St

Allen, TX, 75002

On Tue, Apr 8, 2025 at 7:27 PM <Morgan.Jones@gtlaw.com> wrote:

Dilip: Attached is the draft Joint Rule 26(f) Conference Report we prepared. Please track any changes you propose. As a reminder, this is due for filing on Friday.

Morgan Jones

Associate

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Thanks

Dilip

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Thanks

Dilip